

DAVID T. MALOOF (DM 3350)
THOMAS M. EAGAN (TE 1713)
MALOOF BROWNE & EAGAN LLC
411 Theodore Fremd Avenue - Suite 190
Rye, New York 10580
(914) 921-1200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Complaint

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08 Civ.3714 (LAK)

Of

:
NOTICE OF MOTION

Salt Route, Ltd., as Owner of the M/V
JOANNE I, For Exoneration from or
Limitation of Liability

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PLEASE TAKE NOTICE THAT, pursuant to the Local Rule 1.4, and upon the Declaration of Thomas M. Eagan dated July 9, 2008, and the accompanying Stipulation, Claimants Abonos Colombianos S.A. and Industria Nacional de Gaseosas S.A., will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, in the United States Courthouse, Room 1310, 500 Pearl Street, New York, New York 10013, for an Order Substituting its Attorneys and for such other relief as the Court deems proper and just.

Dated: Rye, New York
July 9, 2008

MALOOF BROWNE & EAGAN LLC

By 

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